

GOLDSTEIN & RUSSELL, P.C.

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August 5, 2020

Via CM/ECF

Hon. Lorna G. Schofield
United States District Court
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: 20-cv-4322-LGS, *King v. Habib Bank Limited*, Request for Adjournment of Initial Case Management Conference

Dear Judge Schofield,

I represent the plaintiffs in this action and write to respectfully move, pursuant to your honor's Individual Rule of Practice I.B.2, for an adjournment of the initial case management conference currently scheduled for August 13, 2020, at 10:50 AM. This is the first request for an adjournment, and the position of the defendant, Habib Bank Limited, is unknown. I request that the conference be adjourned until service of the complaint on defendant is completed or contact with defendant's counsel has been made, at which point I propose to submit a letter to the Court advising it of the status of the case and requesting a new conference date.

An adjournment is warranted to ensure that the conference will be useful to the Court. Defendant is a bank in Pakistan. We are in the process of serving the complaint pursuant to the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters by delivering it to the central authority of Pakistan, the Pakistani Ministry of Law and Justice, for service on defendant. We engaged an international process server to send the complaint and summons to the Ministry of Law and Justice on June 24, 2020; tracking information shows that the package arrived at the Ministry on July 15, 2020. We do not yet have confirmation that the complaint has been served on defendant. We understand that this process may take some time, and perhaps longer than usual due to the COVID-19 pandemic.

Because of the delays inherent to international service to Pakistan, we do not know the identity of defendant's counsel, we do not know what defenses they intend to

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raise, nor what motions they intend to file, and we have not had a chance to meet and confer regarding deadlines. Accordingly, we believe that it would be premature to hold the initial case management conference as scheduled. Once the complaint is served, or contact with defendant's counsel has been made, we will of course promptly seek to move the case forward, and propose to submit a further letter at that time requesting a new date for the initial conference.

For the foregoing reasons, I respectfully request that the initial case management conference be adjourned until service of the complaint on defendant is completed or contact with defendant's counsel has been made, at which point I will promptly advise the Court of the status of the case and request a new initial case management conference date.

Respectfully submitted,

s/Tejinder Singh

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Application GRANTED in part. The initial pretrial conference scheduled for August 13, 2020, is adjourned to **September 24, 2020, at 10:50 a.m.** The joint pre-conference materials will be due **September 17, 2020**. Should Plaintiffs require additional time to complete service or reach Defendant's counsel, a renewed request for adjournment must be made at least two days prior to the deadline to file the materials, or by **September 15, 2020**.

Dated: August 6, 2020
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE